

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
(Pequot Lakes, Minnesota))
)

File No. RM-_____

To: The Chief,
Allocations Branch

PETITION FOR RULEMAKING

Minnesota Christian Broadcasters, Inc. ("MCBI"), licensee of FM Broadcast Station KTIG, Pequot Lakes, Minnesota, hereby requests that the Commission institute a rulemaking proceeding for the purpose of amending Section 73.202(b) of the Commission's rules as follows:

<u>City</u>	<u>Present</u>	<u>Propose</u>
Pequot Lakes, MN	261A	274C2

Further, MCBI requests that the Commission issue an Order to Show Cause why the license of Station KTIG for operation on Channel 261A should not be modified to specify operation on Channel 274C2 pursuant to Section 1.420(g) of the Commission's rules.

As shown in the attached engineering statement (Exhibit No. 1), the proposed change in the Table of Allocations may be made at Station KTIG's present transmitter site. Adoption of the requested allocation will permit Station KTIG to remain at its present location and not require a move of the Station's facilities.

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Channel 274C2 is not an adjacent channel to KTIG's present operation on Channel 261A. Accordingly, in the event that another party expresses an interest in filing for the upgraded facility, MCBI has determined that Channel 237C2 may also be allocated to Pequot Lakes, Minnesota. As such, pursuant to Section 1.420(g)(2) of the Rules, the Commission may modify the license of Station KTIG and allocate Channel 237C2 for interested applicants. Therefore, in the event an expression of interest is filed with respect to the upgraded facilities at Pequot Lakes, Minnesota, it is requested that Channel 237C2 be specified for new applications and that Channel 274C2 be allocated for Station KTIG.

Adoption of the instant proposal is in the public interest as it will result in greatly improved coverage to Pequot Lakes and the surrounding areas by KTIG -- the community's only authorized FM broadcast station.

MCBI hereby states that upon adoption of the proposed change it will expeditiously apply for modification of the KTIG license and, upon grant, will promptly build the new Class C2 facility.

WHEREFORE, It is requested that the Commission institute a rulemaking proceeding for the purpose of amending the table of allotments as described above to permit operation of Station KTIG, Pequot Lakes, Minnesota on Channel 274C2.

MINNESOTA CHRISTIAN BROADCASTERS, INC.

By 
DENNIS F. BEGLEY
Its Counsel

Reddy, Begley & Martin
2033 M Street, N.W.
Suite 500
Washington, D.C. 20036

April 9, 1992

Exhibit No. 1

ENGINEERING REPORT

ENGINEERING REPORT
PROPOSAL TO SUBSTITUTE
CH 274C2 FOR CH 261A
IN THE FM TABLE OF
ALLOTMENTS
PEQUOT LAKES, MINNESOTA

E. HAROLD MUNN, JR. & ASSOCIATES, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

REQUEST FOR RULE MAKING
AT PEQUOT LAKES, MINNESOTA

The firm of E. Harold Munn, Jr. & Associates, Inc. was retained to prepare this engineering statement in support of a petition for changes in the FM Table of Allotments, 47 C.F.R. Section 73.202(b). It is proposed to substitute Channel 274C2 for Channel 261A at Pequot Lakes, Minnesota.

Channel 261A is presently in use at Pequot Lakes, Minnesota, by FM Broadcast Station KTIG. The licensee has long desired to improve service to the public by providing a wide-area signal, which can be attained by a Class C2 facility. The determination has been made that Channel 274C2, 102.7 MHz, may be substituted for Channel 261A, at the present KTIG transmitter site in full conformance with the spacings of Section 73.207.

Exhibit 1 is a pertinent portion of the computer study which demonstrates that, at the reference point listed, all required separations are met.

Therefore, it is requested that Section 73.202(b) be amended to substitute Channel 274C2 for Channel 261A at Pequot Lakes, Minnesota, and that FM Station KTIG be issued a "show cause" order, specifying operation on the higher class channel.

Since Channel 274C2 does not have a "protected" channel relationship to the present KTIG operation on Channel 261A, in accordance with Commission practice a study has been made to determine that an additional Class C2 channel is allocable to Pequot Lakes, in the event another party would express interest in such a channel.

It has been determined that Channel 237, 95.3 MHz, may be added, with a specified reference point about 23 km northeast of Pequot Lakes. Exhibit 2 is a tabulation showing that the reference point selected meets the spacing requirements of Section 73.207. This is a point within Crow Wing county, from which the 3.16 mV/m contour would encompass Pequot Lakes.

Therefore, it is requested that 47 C.F.R. Section 73.202(b) be amended as follows:

<u>City-State</u>	<u>Present</u>	<u>Proposed</u>
Pequot Lakes, Minnesota	261A	274C2

CERTIFICATION

This engineering statment was prepared by the undersigned, a member of the staff of E. Harold Munn, Jr. & Associates, Inc., Broadcast Technical Consultants, with offices at 100 Airport Drive, Coldwater, Michigan 49036-0220

I hereby certify the contents of this Engineering Statement to be true and accurate to the best of my knowledge and belief. My qualifications are a matter of record before the Federal Communications Commission.

Dated this 3d day of April, 1992 by


Virgil M. Royer
Staff Engineer

EXHIBIT 1

E. HAROLD MUNN JR & ASSOCIATES
P.O. BOX 220 COLDWATER MI 49036-0220

KTIG UPGRADE TO CLASS C2
PEQUOT LAKES, MN

REFERENCE		CLASS C2	DISPLAY DATES
46 36 06 N			DATA 02-26-92
94 18 55 W		Current rules spacings	SEARCH 04-02-92
----- CHANNEL 274 -102.7 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WLTE	275C	Minneapolis	MN	151.9	193.94	188.0	5.94
LI CN	45 03 45	93 08 22	100.000 kW	396M	120.5	116.8	
		WLTE FM, Inc.			BLH6692		
WLTE.C	275C	Minneapolis	MN	151.7	194.91	188.0	6.91
CP CN	45 03 30	93 07 27	100.000 kW	315M	121.1	116.8	
		WLTE FM, Inc.			BPH871106IQ		
KNTN.C	274C1	Thief River Falls	MN	311.4	231.28	224.0	7.28
CPMZCN	47 58 38	96 36 32	100.000 kW	164M	143.7	139.2	
		Minnesota Public Radio			BMPH900131IC		920108
KQIC	273C1	Willmar	MN	200.9	167.39	158.0	9.39
LI CN	45 11 40	95 05 01	100.000 kW	253M	104.0	98.2	
		Lakeland Broadcasting Co.			BLH810522AG		
KZIO	273C1	Superior	WI	82.9	169.27	158.0	11.27
LI CN	46 47 21	92 07 09	100.000 kW	183M	105.2	98.2	
		WDSM/KZIO, Inc.			BLH790827AE		
WYRQ	221A	Little Falls	MN	178.9	72.54	15.0	57.54
LI CN	45 56 57	94 17 48	3.000 kW	91M	45.1	9.3	
		Schiel Broadcasting, Inc.			BLH800516AF		

EXHIBIT 2

E. HAROLD MUNN JR & ASSOCIATES
P.O. BOX 220 COLDWATER MI 49036-0220

ALTERNATE CLASS C2 CHANNEL
PEQUOT LAKES, MN

REFERENCE		CLASS C2	DISPLAY DATES
46 46 54 N			DATA 02-26-92
94 09 15 W		Current rules spacings	SEARCH 04-02-92
----- CHANNEL 237 - 95.3 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)	
KBEK.C	238C3	Mora	MN	156.5	117.05	117.0	0.05	<
CPM CN	45 48 57	93 32 56	17.000 kW	120M	72.8	72.7		
	John James Godfrey				BMPH910228IC		920309	
KKDL	236C1	Detroit Lakes	MN	265.7	158.94	158.0	0.94	<
LI CN	46 40 27	96 13 39	100.000 kW	296M	98.8	98.2		
	Leighton Enterprises, Inc.				BLH881003KC			
>FROM CHANNEL 237 PER D84-719								
KNSPFM	234A	Staples	MN	225.7	67.23	55.0	12.23	
CP CN	46 21 34	94 46 55	3.000 kW	37M	41.8	34.2		
	Staples Broadcasting, Inc.				BPH880310NR		910118	
KMXK	237A	Litchfield	MN	189.5	187.58	166.0	21.58	
LI CN	45 07 02	94 33 13	3.000 kW	91M	116.6	103.2		
	Litchfield Broadcasting Corpo				BLH7137			
>*TO CHANNEL 235C2 PER D87-412-To amend to Cold Spring, MN per D90-6								
AP237	237C2	Willmar	MN	203.8	213.66	190.0	23.66	
AP CN	45 01 23	95 15 57	50.000 kW	150M	132.8	118.1		
	Kandi Broadcasting, Inc.				BPH910821MD		920131	
ALOPEN	237C2	Willmar	MN	204.5	214.95	190.0	24.95	
AL N	45 01 20	95 18 14	0.000 kW	0M	133.6	118.1		
	87-483		WO= 910723				910822	
>Site restricted-Effective 06-22-91								

